



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION III  
1650 Arch Street  
Philadelphia, Pennsylvania 19103-2029**

April 25, 2011

Victoria Rutson  
Director, Office of Environmental Analysis  
Surface Transportation Board  
395 E Street, SW  
Washington, DC 20423

Attn: Danielle Gosselin

RE: Environmental Filing FD 35116 - Supplemental Draft Environmental Impact Statement  
R.J. Corman Railroad Company/Pennsylvania Lines Inc. CEQ 20110072

Dear Ms. Rutson:

In accordance with the National Environmental Policy Act (NEPA) and Section 309 of the Clean Air Act, the U.S. Environmental Protection Agency (EPA) has reviewed the Supplemental Draft Environmental Impact Statement (SDEIS) for the above mentioned project. The SDEIS was prepared to meet the requirements of NEPA as new information as become available since the original Draft Environmental Statement was released in July of 2010. The proposed rail line would be approximately 20 miles long, located in Pennsylvania's eastern Clearfield County, primarily in Morris and Copper Township and in western Centre County, Rush and Snow Shoe Townships. The Preferred Alternative remains the Modified Proposed Action.

The purpose of the project remains to service proposed development near Gorton Pennsylvania. Originally, a landfill had been proposed as part of the development. Currently, the landfill proposal has changed to include a waste-to-ethanol plant. Other speculative development remains the same including a quarry, industrial park, and a "frac water" treatment plant, but some changes have resulted from new entities (owner/operators) that have become responsible for particular actions or projects.

Additional information became available which necessitated the need prepare a Supplemental DEIS. The SDEIS addresses the following issues: 1) the potential environmental impacts associated with R.J. Corman Railroad Company (RJCP) proposed transport of ethanol, a regulated hazardous material, over the rail line, 2) the change in the preliminary plan approval status of the No-Build Alternative – Local Road System (Black Rock Road, 3) the results of the 2010 summer field survey for Branching Bur-Reed (sparganium androcladum) a Pennsylvania Endangered Species (which demonstrated the absence of the species).

EPA provided written comments on the DEIS on September 28, 2010. In that letter, EPA, in accordance with NEPA, rated the proposed action as Environmental Concerns (EC), Insufficient Information (2) because of its potential impacts to irretrievable environmental resources. OEA has indicated that they will be responding to all comments they received in the Final EIS. Therefore EPA also has rated the SDEIS as EC2 as our concerns have not yet been addressed. For more information on our rating guidelines go to [www.epa.gov/compliance/nepa/comments/ratinggs.html](http://www.epa.gov/compliance/nepa/comments/ratinggs.html)

EPA offers the following additional comments for your consideration when developing the Final EIS.

- The SDEIS indicates that the waste-to-ethanol plant would result in a smaller impact to land use, however due to the preliminary nature of the actions OEA was unable to quantify an exact difference in effected acreage. In order to clarify the cumulative effects of the secondary developments, EPA suggests the FEIS provide a map and a more detailed description of the potential environmental resources that may be impacted within the associated industrial park, quarry, and treatment plants.
- Very little information has been provided regarding the proposed "frac water" treatment facility. Please provide more information on this expected facility.
- It is unclear which actions will occur first. If the rail line is active before the development is begun will the rail line be used to transport construction material? If the development is ready to begin before the rail is active, will the local road system be improved to accommodate the construction traffic?
- Will the local road improvements need to be implemented to accommodate workers, non-rail deliveries, etc? Please provide information regarding infrastructure improvements that are planned for the expected development.

EPA appreciates the opportunity to comment on this SDEIS. We look forward to reviewing your responses to our environmental concerns. If you should have any questions regarding these comments, please feel free to contact Mrs. Jamie Davis at 570-842-1044 or by email at [davis.jamie@epa.gov](mailto:davis.jamie@epa.gov).

Sincerely,



Barbara J. Rudnick  
NEPA Team Leader  
Office of Environmental Programs